

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RUSTEM KAZAZI, et al.

Movants,

v.

U.S. CUSTOMS AND BORDER
PROTECTION, et al.

Respondents.

No. 1:18-MC-00051-DAP

JUDGE DAN AARON POLSTER

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
ATTORNEYS' COSTS OR FEES AND RESPONDENTS' RESPONSE THERETO**

Movants Rustem, Lejla, and Erald Kazazi respectfully submit this Consent Motion for Extension of Time to File Motion for Attorneys' Costs or Fees and Respondents' Response Thereto. Counsel for Respondents has consented to this request. On November 19, this Court granted parties' Stipulated Dismissal (ECF #15). The current deadline for Movants to file their motion for attorneys' fees under 28 U.S.C. § 2465 is therefore now December 3, 2018. Fed. R. Civ. P. 54(d)(2)(B)(i). These dates may not be altered except by court order. *See* Fed. R. Civ. P. 54(d)(2)(B). Movants request a fourteen (14) day extension to December 17.

Counsel for Movants Wesley Hottot has expended most of the time that would be the subject of the fee motion. Mr. Hottot is also counsel of record in *Timbs v. Indiana*, No. 17-1019, and has been preparing for argument at the U.S. Supreme Court on November 28, 2018. Movants

respectfully request this extension so that Mr. Hottot is able to diligently and adequately contribute to the motion for attorneys' fees.

Respondents' motion in opposition would then be due December 31, 2018. Local Civil Rule 7.1(d). Because Respondents' counsel will be on vacation for the holiday season, Movants also request that Respondents be given a nine day extension to January 9, 2019.

Movants therefore request (1) that Movants' time to file a motion for attorneys' fees be extended fourteen (14) days, to be due December 17; and (2) that Respondents' time to respond to Movants' motion be similarly extended to be due January 9, 2019.

DATED this November 20, 2018.

Respectfully submitted,

/s/ Patrick T. Lewis

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Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2018, a copy of the foregoing Motion filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to Respondents indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Robert J. McNamara
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